

Michael Kind, Esq.
Nevada Bar No. 13903
KIND LAW
8860 South Maryland Parkway, Suite 106
Las Vegas, Nevada 89123
(702) 337-2322
(702) 329-5581 (fax)
mk@kindlaw.com

George Haines, Esq.
Nevada Bar No. 9411
Gerardo Avalos, Esq.
Nevada Bar No. 15171
FREEDOM LAW FIRM
8985 S. Eastern Ave, Suite 350
Las Vegas, Nevada 89123
(702) 880-5554
(702) 385-5518 (fax)
Ghaines@freedomlegalteam.com
Counsel for Anika Romano

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

Anika Romano,

Plaintiff,

vs.

Trans Union LLC; Citicorp Credit
Services, Inc. (USA) dba Citicards;
Harris & Harris Ltd.; and Bank of
America, N.A.,

Defendants.

CASE NO.: 2:22-cv-00168-APG-NJK

**Unopposed Motion For Extension of Time For
Trans Union to Answer Complaint**

[Second Request]

Plaintiff Anika Romano ("Plaintiff") hereby files her Unopposed Motion for Extension of Time for Trans Union to Answer ("Motion") and in support states:


1. Trans Union's responsive pleading is due on March 24, 2022.
2. Plaintiff and Trans Union are actively engaged in case-resolution negotiations.
3. Plaintiff and Trans Union are also engaged in informal discovery to assist the case resolution efforts.

- 1 4. Plaintiff does not oppose an extension of Trans Union's time to answer the complaint so that
 2 the parties may devote their energies to resolving this matter. Plaintiff files this Motion
 3 consistent with its agreement with Trans Union respectfully requesting the Court for an
 4 extension of time to file its responsive pleading for 30 days, to **April 23, 2022**.
- 5 5. The Motion is filed in good faith and not for delay.
- 6 6. This is the second request for an extension of time for Trans Union to answer complaint and
 7 the requested extension does not prejudice the parties.
- 8 7. For the foregoing reasons, Plaintiff requests that the Court issue an order extending the date,
 9 to **April 23, 2022**, on which Trans Union must answer or otherwise respond to Plaintiff's
 10 Complaint.

11 **Dated:** March 23, 2022.

	<p>FREEDOM LAW FIRM</p> <p>By: <u>/s/ Gerardo Avalos</u> George Haines, Esq. Nevada Bar No. 9411 Gerardo Avalos, Esq. Nevada Bar No. 15171 8985 S. Eastern Ave, Suite 350 Las Vegas, Nevada 89123 (702) 880-5554 (702) 385-5518 (fax) Ghaines@freedomlegalteam.com Gavalos@freedomlegalteam.com <i>Counsel for Plaintiff Evelyn Jones</i></p>
--	--

22
 23
 24 IT IS SO ORDERED.

25 
 26 _____
 United States Magistrate Judge

27 DATED: March 24, 2022
 28 _____